

AARON D. FORD  
Attorney General  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General  
State of Nevada  
Office of the Attorney General  
555 E. Washington Ave., Ste. 3900  
Las Vegas, NV 89101  
(702) 486-3770 (phone)  
(702) 486-2377 (fax)  
KSamuels@ag.nv.gov  
*Attorneys for Respondents*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DERRELL LEE CHRISTY, JR.,  
  
Petitioner,  
  
vs.  
  
WILLIAM HUTCHINGS, *et al.*,  
  
Respondent(s).

Case No. 2:21-cv-00132-APG-BNW

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
RESPONSE TO SECOND AMENDED  
PETITION FOR WRIT OF HABEAS  
CORPUS (ECF NO. 18)**

**(SECOND REQUEST)**

Respondents move this Court for an enlargement of time of fourteen (14) days from the current due date of April 14, 2022, up to and including April 28, 2022, in which to file their Response to Christy's Second Amended Petition for Writ of Habeas Corpus (ECF No. 18). This motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

This is the second enlargement of time sought by Respondents and is brought in good faith and not for the purpose of delay.

DATED April 14, 2022

Submitted by:

AARON D. FORD  
Attorney General

By: /s/ Katrina A. Samuels  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General

**DECLARATION OF KATRINA A. SAMUELS**

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

I, Katrina A. Samuels, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Derrell Lee Christy Jr. v. William Hutchings, et al.*, Case No. 2:21-cv-00132-APG-BNW, and as such, have personal knowledge of the matters contained herein.

2. This motion is made in good faith and not for the purpose of delay.

3. The Response to Christy's Second Amended Petition is currently due on Thursday, April 14, 2022.

4. Respondents have been unable with due diligence to timely complete the Response.

5. In the past few months, Respondents filed a Motion to Dismiss due February 4, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); a Motion to Dismiss due February 10, 2022 (*Cory O'Neal Brewer v. William Gittere, et al.*, Case No. 3:20-cv-00396-MMD-CLB); a Response to a Request for Judicial Notice due February 23, 2022 (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); an answer due March 14, 2022 (*Mazen Alotaibi v. Renee Baker*, Case No. 2:21-cv-01281-CDS-BNW); a Reply in Support of Motion to Dismiss due March 18, 2022 (*Ricardo Quintanilla v. Brian Williams, et al.*, Case No. 2:20-cv-00211-GMN-NJK); a Response to Motion to Provide Justice Court Records due April 8, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); and various responses in state post-conviction cases.

6. Respondents communicated with counsel for Christy regarding this extension and she does not object to this request.

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5 Executed on April 14, 2022.

/s/ Katrina A. Samuels  
Katrina A. Samuels (Bar. No. 13394)  
Deputy Attorney General

  
UNITED STATES DISTRICT COURT

Dated: April 15, 2022